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Attorney for Defendant
JOEY DONALD STEWART CAMPBELL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-cr-0206-TLN
)	
Plaintiff,)	STIPULATION FOR TEMPORARY
)	MODIFICATION OF CONDITIONS OF PRETRIAL
vs.)	RELEASE; ORDER
)	
JOEY DONALD STEWART)	Hon. Carolyn K. Delaney
CAMPBELL,)	
)	
Defendant.)	

The defendant, JOEY DONALD STEWART CAMPBELL, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Roger Yang, hereby stipulate to and request an order from this Court temporarily modifying the conditions of Mr. Campbell's pretrial release to permit him to attend a family gathering at High Steaks Restaurant and Thunder Valley Casino in Lincoln, CA. The parties have conferred with Mr. Campbell's assigned pretrial services officer, who approves of this stipulated modification.

Mr. Campbell has been on pretrial release in this district since October 2021, on a \$100,000 secured appearance bond. *See* Dkt. 12. Additionally, Mr. Campbell was appointed a third party custodian: Doreen Bailey. Mr. Campbell is in compliance with all of his conditions of release. One of those conditions of release is location monitoring. Mr. Campbell is subject to home detention, and therefore must remain inside his residence except for pre-approved employment; education; religious services; medical, substance abuse, or mental health treatment;

1 attorney visits; court appearances; court ordered obligations; or other activities authorized by the
2 pretrial services officer¹.

3 Mr. Campbell requests, and the parties agree and so stipulate, that his Conditions of
4 Release be temporarily amended to specifically permit him to attend a family gathering the High
5 Steaks restaurant in Thunder Valley Casino in Lincoln, CA on July 30, 2022. Given the location
6 of the event, there will be no minors present/permitted within the restaurant or casino. Mr.
7 Campbell's mother and third-party custodian will be in attendance with him and will be
8 responsible for driving Mr. Campbell to and from the gathering, which is scheduled to begin at
9 5:00 p.m. and last several hours.

10 Thunder Valley Casino is approximately 35 minutes by car from Mr. Campbell's
11 residence. Allowing some additional time for traffic, the parties request a temporary
12 modification of pretrial conditions to permit Mr. Campbell depart his home at 4:00 p.m. on July
13 30, 2022, and to return home by 11:00 p.m. that same day. Mr. Campbell will be in the company
14 of his third-party custodian during the entire event. Mr. Campbell will return directly to his
15 residence at the conclusion of the gathering.

16 The proposed temporarily amended condition is attached to this request. The parties do
17 not request a hearing in this matter in light of this stipulation.

18
19 Respectfully submitted,

20 DATED: July 27, 2022

HEATHER E. WILLIAMS

21 Federal Defender

22 /s/ Megan T. Hopkins

23 MEGAN T. HOPKINS

24 Assistant Federal Defender

Attorney for JOEY DONALD STEWART CAMPBELL

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26
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28 ¹ Pretrial services interprets this condition to only permit their approval of other activities which are deemed
essential, with all other activities requiring the approval of the Court.

1 DATED: July 27, 2022

PHILLIP A. TALBERT

2 United States Attorney

3 /s/ Roger Yang

4 ROGER YANG

5 Assistant United States Attorney

6 Attorney for the United States

ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Special Conditions of Release for defendant, Joey Donald Stewart Campbell, be Temporarily Amended such that he is permitted to depart his residence at 4:00 p.m. on July 30, 2022, to attend a family gathering at Thunder Valley Casino and the High Steaks Restaurant in Lincoln, CA and return to his residence no later than 11:00 p.m. on July 30, 2022. All other conditions of pretrial release shall remain in force.

The Temporary Amended Special Condition of Release is hereby adopted.

Dated: July 28, 2022



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE